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10 United States of America

11 IN THE UNITED STATES DISTRICT COURT
12
13 EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,

15 CASE NO. 1:24-CR-00081-KES-BAM

16 Plaintiff,

17 STIPULATION TO CONTINUE STATUS
18 CONFERENCE; AND ORDER

19 v.

20 JOSEPH ROCHA

21 Defendants.

22 IT IS HEREBY STIPULATED by and between the parties that the status conference set for August
23 13, 2025 at 1:00 pm before the Honorable Barbara A. McAuliffe be continued to October 22, 2025 at 1:00
24 p.m.

25 **STIPULATION**

26 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
27 through defendant's counsel of record, hereby stipulate as follows:

28 1. The case is set for continued motion to suppress and evidentiary hearing on August 12,
1. The case is set for continued motion to suppress and evidentiary hearing on August 12,
2. The court has not indicated whether it will rule from the bench or take the matter under
3. The outcome of the motion may be dispositive as to the case.

4. However the court rules, the parties will need time to meet and confer prior to a status
conference.

5. By this stipulation, the parties now move to continue the status conference, and to
6. exclude time from August 13, 2025 to October 22, 2025.

7. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the discovery associated with this case
2 includes investigative reports, and related documents, photographs, etc., in electronic form. All
3 of this discovery has been either produced directly to counsel and/or made available for
4 inspection and copying.

5 b) With respect to the additional time from August 13, 2025 to October 22, 2025, an
6 end-of-justice delay is appropriate to give the Court time for the prompt disposition of
7 defendant's motion to suppress evidence. The parties also request additional time for plea
8 negotiations and defense investigation.

9 c) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 d) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of August 13, 2025 to October 22,
14 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (h)(1)(D), and
15 (h)(7)(B)(iv) because it results from a continuance granted by the Court at defendants' request on
16 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
17 best interest of the public and the defendants in a speedy trial.

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19 **[Remainder of page intentionally left blank.]**
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5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: August 7, 2025

Respectfully submitted,

KIMBERLY A. SANCHEZ
Acting United States Attorney

By /s/ Robert L. Veneman-Hughes
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney

Dated: August 7, 2025

/s/ Christina Corcoran
CHRISTINA CORCORAN
Attorney for Defendant JOSEPH ROCHA

ORDER

IT IS SO ORDERED that the status conference is continued from August 13, 2025, to **October 22, 2025 at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), (h)(1)(D), and (h)(7)(B)(iv). The parties should be prepared to pick a trial date at a future status conference in 2025.

IT IS SO ORDERED.

Dated: **August 7, 2025**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE